

REMARKS

Applicant thanks the Examiner for the substantive allowance of all pending claims, and for the careful attention given during the review. Applicant presents the foregoing amendments in an effort to comply with all outstanding issues raised.

With respect to the indefiniteness rejection on page 3, the Examiner contends that claims 3, 5, and 8 omit “essential structural cooperative relationships of elements,” such as “the structural relationship between compartments and the containers.” Claim 1 specifies that the free-standing arched frames include gas-fillable compartment(s), and that one or more water-fillable containers are supported or supportable by the or each free-standing frame. Claim 3 simply specifies further that these “compartments are made up of pressurisable material which bulges outwardly under pressure to assume a part cylindrical shape which, in combination are sufficiently rigid to support the water-fillable containers.” Nothing in claim 3 changes the notion that the frame including the compartments supports the containers.

For claims 5 and 8, the Examiner questions “how the containers . . . are removable” and “how is the structure supports [*sic supporting*] the weight of the water.” Respectfully, the function of a claim is to define the scope of the invention, rather than to explain how it works, which is the province of the specification. *SRI Int'l v. Matsushita Elec. Corp.*, 775 F.2d 1107, 1121 n.14 (Fed. Cir. 1985) (en banc) (“Specifications teach. Claims claim.”). That a claim does not describe “how” something occurs is not a proper ground for a rejection under Section 112, second paragraph. Nothing in MPEP 2172.01 is to the contrary. Reconsideration is respectfully requested.

With respect to the drawing objections, Applicant encloses amendment figures to address the concerns raised by the Examiner with respect to the camera and sensors/wires. The “chicane” of claim 9 corresponds to wall 7, so no new illustration is required. No new matter is added.

Finally, Applicant presents new claim 18, which is consistent with the Examiner's reason for the indication of allowable subject matter.

In light of the foregoing, a Notice of Allowance is earnestly solicited. Should the Examiner identify any further issues requiring attention, he is invited to contact the undersigned to expedite the allowance of the case. Please debit any fees due from Deposit Account 11-0978.

Respectfully submitted,

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